

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK**

**Association of Jewish Camp Operators,**

**Samuel Werzberger, MD, FAAP,**

**Ariela Orkaby, MD, MPH,**

**Beth Statfeld,**

**Gail Zahtz,**

*Plaintiffs,*

v.

**Andrew M. Cuomo,** Governor of the  
State of New York, in his official capacity,

*Defendant.*

Case No. 1:20-CV-0687 (GLS-DJS)

**DECLARATION OF RABBI AVROHOM SCHWARTZ**

Pursuant to 28 U.S.C. § 1746, I, Rabbi Avrohom Schwartz, hereby declare as follows:

1. I am the Assistant Learning Director in Camp Romimu, During the school year, I am a religious studies teacher at a yeshiva in Brooklyn, New York. I have worked in the field of Jewish studies for more than a quarter-century.

2. The foundation of Jewish life is built upon community, and Jewish education is the cornerstone of our society. It ensures the continuity of the Jewish people as it nurtures and educates children in the practices and beliefs of our heritage. Another vital foundation of our religion is communal prayer. Jews gather three times a day for morning, afternoon and evening prayers.

3. Jewish camping is an outgrowth of providing an ideal Jewish community to our youth. Ensconced in an atmosphere of purity, without any outside, negative influences, children

and teenagers are afforded the opportunity to grow in their religious beliefs and sense of community.

4. While attending Jewish overnight camps, all the religious and socio-emotional needs of the campers are met. Younger campers experience prayer services on a consistent basis and learn to understand the meaning of the prayers. Prayer services are coupled with instruction in Jewish law and inspirational insights into prayer and life.

5. Jewish overnight camps serve as an extension of our educational system. Jewish overnight camps provide instruction in religious texts, including the Bible, the Mishna, and the Talmud.

6. In my experience, the educational atmosphere of camp is more inspiring than similar instruction during the regular school year. The traditional school pressures are removed, leading to a learning environment that allows many children to thrive. Campers are also taught – by their lived experience – that Jewish learning and Jewish life never stops, but instead continues in all contexts.

7. In my experience, campers have a far reduced level of the typical “summer drop off” that is observed in others when the school year recommences. As a religious studies teacher in yeshiva schools for a quarter-century, it is quite noticeable that students who attend overnight camp often are educationally ahead of their peers.

8. A significant portion of the calendar is observed during the summer months when schools are closed. It was during these months that our Holy Temple was destroyed 2000 years ago. Much time is spent explaining the history of our people and discussing this tragedy. These lessons are unique to overnight campers, as schools are closed during the summer and even Jewish day camps close on the anniversary of the destruction of the Temple.

9. The Sabbath is the focal point of the overnight camp week. Labeled as a “day of rest”, it is truly a day meant to be spent connecting with God. We connect through our prayers and our learning. Once again, prayer services are held for each age group at their appropriate level. Both formal learning sessions and additional voluntary learning opportunities are provided. In my camp alone, on a typical Saturday afternoon, one can witness over 400 campers participating in a voluntary learning session. Such opportunities are not readily available outside the overnight camp environment.

10. Communal meals also serve as an educational opportunity. They afford the opportunity to teach campers the appropriate blessings to say before and after meals. Ritual handwashing is taught and encouraged. During the Sabbath, many traditional songs and hymns are taught and sung.

11. Another important aspect of the overnight camp experience is the up-close look a camper is afforded at religious role models. The Rabbis of the camp are easily accessible and readily available to speak, advise, and instruct campers. Campers have the opportunity to watch how these role models pray, learn, interact with others and conduct their daily lives.

12. A camper’s counselor, although closer in age, also serves as a role model. The counselors too participate in all prayer services as well as learning activities. Counselors become the confidants of the campers and are able to guide them towards the proper religious actions. Campers are many times more willing to accept the gentle guidance of a counselor as opposed to a formal teacher or Rabbi.

13. The overnight camp experience is also a highly educational experience for the older teenagers who serve as counselors. They must serve as role models to the campers who look up to them. They are expected to not only guide the campers in formal activities like prayer and

learning, but also in proper character traits in the bunkhouses, ball fields, and dining room. Teenagers who serve as overnight camp counselors very often become leaders in the broader Jewish community.

14. I have been a Jewish educator – in schools and in overnight camps -- for more than two decades. I have personally witnessed the positive religious effect of overnight camps on the children and teenagers who attend them. Campers who were immersed in the religious atmosphere of such camps are educationally solid and become thriving members of the Jewish community.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 21, 2020.

A handwritten signature in black ink, consisting of a stylized 'A' and 'S' combined, positioned above a horizontal line.

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Rabbi Avrohom Schwartz